



CGB-CC-1189

Bishop Rosie S. O'neal  
Senior Pastor

Tuesday, January 17, 2012

Received & Inspected

JAN 18 2012

FCC Mail Room

Office of the Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
445 12th Street, SW  
Washington, DC 20554

RE: Request for exemption from Commission's closed captioning rules

Dear Sir or Madam,

Koinonia Christian Center (KCC) is located in Greenville, NC and is requesting exemption from the closed captioning requirements based upon Section 79.1(f) of the Commission's rules. KCC was founded in February 1989 and is a vision led church with a passion for making a difference in the lives of people. For over twenty years, we have provided Biblical-based counseling and instruction. The local communities we serve and broadcast to are as follows: Greenville, Ayden, Farmville, Bethel, Winterville, Grifton, Washington, Belhaven, New Bern, and Vanceboro.

KCC serves the community through a monthly food bank, shelter, prison, youth, hospice, and Meals on Wheels ministries as well as an afterschool and summer camp programs, and marital and premarital counseling. In addition, KCC provides Christian-based outreach festivals annually.

#### Introduction

Our television program entitled *Matters of the Heart* is a 30-minute broadcast that airs on Sunday, Monday, Wednesday, and Thursday once per day on a weekly basis. The broadcast is filmed, edited, and produced in-house with the help of a part-time editor and a host of volunteer staff members.

The *Matters of the Heart* broadcast is distributed as a non-news program which airs portions of our worship services and conferences.

Compliance would impose an undue burden upon Koinoina Christian Center under Section 79.1(f) for the following reasons.



Bishop Rosie S. O'neal  
Senior Pastor

### **Nature and Cost of Closed Captions**

The process of converting all programs into closed captioned would cost us an additional \$418.50 per week @ 52 weeks which equates to \$21,762 per year (See attachments 2, 3, and 4). As previously stated, we currently produce our broadcast using one part-time editor and a host of non-professional volunteers. This closed caption additional cost is 50% over our budget for providing our current broadcast program to our viewing audience. (See attachment 1 for program costs.)

### **Other Options**

Captioning assistance is not available from the television station. Our station indicated lack of support via the following response:

*"We do not have the equipment to add the closed captioning to our spots as we only produce spots up to 2 minutes in length."*

Outsourcing, purchasing other equipment, and hiring skilled professionals to operate the broadcast would create considerable strain. (See basic impact summary on attachment 5.)

### **Conclusion**

We are requesting the Commission to grant a wavier from the closed caption requirements in this case as it would cause a significant burden. The cost of captioning would greatly affect our program. Our operation and financial strength is different from a mainstream program provider. It is because of the difficulty and additional expense we are requesting a wavier from captioning based on Section 79.1(f). If more information is required, please contact me at the information below.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Toiriste W. O'neal".

Toiriste W. O'neal  
Director, Operations  
Koinonia Christian Center Church  
Greenville, NC  
252.752.1898 ext. 206





Annual Contract for:  
Koinonia

Date: 12.28.11  
To: Toiriste O'Neal  
From: Lisa Leonard  
RE: Annual Contract agreement for Koinonia


Weekly airings on WFXI – FOX Eastern Carolina:  
Monday, Wednesday and Thursday – 630a-7a - \$185.00 each  
Sunday – 730a-8a - \$355.00 each  
Weekly Rate - \$910.00  
Annual Investment - \$47,860.00  
Schedule dates - Jan 1, 2012 – December 30, 2012  
Jan 2012 – 18 Shows - \$4180.00  
Feb 2012 – 17 shows \$3825.00  
March 2012 – 17 shows - \$3825.00  
Apr 2012 – 18 shows - \$4180.00  
May 2012 – 18 shows - \$4010.00  
June 2012 – 16 shows - \$3640.00  
July 2012 – 18 shows - \$4180.00  
Aug 2012 – 18 shows - \$4010.00  
Sept 2012 – 17 shows - \$3995.00  
Oct 2012 – 18 shows - \$4010.00  
Nov 2012 – 17 shows - \$3825.00  
Dec 2012 – 18 shows - \$4180.00

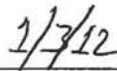
Tapes and check to arrive 2 full business days prior to air date.

Option – Add Tuesday @ 630a-7a for an additional \$150.00/week

WFXI – Lisa Leonard

Date

  
Authorized signature -  
Koinonia

  
Date

**Toiriste O'Neal**

---

**From:** Constance Carlson [ccarlson@vicaps.com]  
**Sent:** Thursday, January 12, 2012 4:31 PM  
**To:** Toiriste O'Neal  
**Cc:** crhoffman@vicaps.com  
**Subject:** Closed Captioning Your Weekly Show  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Hi Toirist,

It was a pleasure making your acquaintance earlier today! Video Caption Corporation would be pleased to assist Koinonia Christian Church with its needs for weekly closed captioning services.

As I understand it, you would supply your weekly shows to us as reference files with window-burn time code – these can be uploaded to our FTP server, if that is amenable to you. We would prefer .avi or .mov files, though we can work with other formats.

Our deliverable to you would be a Caption Data File (Basic Roll-up Style Captions).

Pricing: \$200 per show (discounted)

Price includes transcription, captioning (Basic Roll-up Style Captions), caption file prep, and output. Our standard turnaround for your shows is 3 business days. As a regular client, we will waive rush fees for the occasional 2-day turnaround of your shows and significantly discount our rates on faster turnarounds and other services.

Again Toirist, we would be honored to assist you with your captioning needs. If this is acceptable, I will set you up on our FTP server, so you can start sending us your programs!

Best,

Constance

**Constance Carlson**  
**Vice President, Sales & Marketing**



NEW YORK | BURBANK

800-705-1204 (phone)  
800-705-1207 (fax)

[ccarlson@vicaps.com](mailto:ccarlson@vicaps.com)  
[www.vicaps.com](http://www.vicaps.com)

1/12/2012

# CAPTIONS

Powered by **AUTOMATIC SYNC**  
TECHNOLOGIES

www.automaticsync.com

877-AST-SYNC (877-278-7962)

## Automated Captioning & Transcription Pricing

AST's CaptionSync web-automated captioning is straightforward and simple and significantly faster and less expensive than alternative captioning methods. Because CaptionSync is a web-based service, there is no software to purchase, and it is always available.

Simply upload your media to our CaptionSync server and select whether you want captioning, transcription, or both (a transcript is required in order to create caption output). The outputs you select are returned electronically -- no need to ship anything.

	<u>Captioning Only</u> (have transcript)	<u>Transcription Only</u>	<u>Captioning &amp; Transcription</u> (need transcript)	<u>Production Transcripts</u> (time stamped)
<b>Immediate Turnaround</b>	<b>\$1.48 / minute</b>			
<b>Standard 3-day Turnaround<sup>5</sup></b>		<b>\$1.60 / minute</b>	<b>\$3.08 / minute</b>	<b>\$2.34 / minute</b>
<b>RUSH 24-hour Turnaround<sup>5</sup></b>		<b>\$2.16 / minute</b>	<b>\$3.64 / minute</b>	<b>\$2.90 / minute</b>

Prices are per minute of media.

**Bulk pricing is available for purchases of more than 20 hours; contact us for details.**

### Notes

1. AST will endeavor to caption all content submitted to our system, but content with excessive music or noise may not be captionable by the AST system. Captioning charges only apply for successfully captioned content; failed captioning attempts do not incur caption fees. If you request a transcript, and your content is not captionable, you will receive only the transcript, and you will be billed only for the transcription portion of the fee.
2. Billing resolution is one minute; all submissions are rounded up to the next nearest minute.
3. On approval of credit, terms are Net 30. Invoices are issued monthly.
4. AST makes many caption output formats available; there are no additional charges for requesting and receiving multiple output formats for submission.
5. The turnaround time for transcription is normally less than three business days. RUSH transcription is one business day.
6. Pricing is for caption and/or transcript files for media content that has been electronically submitted to CaptionSync. Call us if you need assistance with other aspects of captioning, including digitization of analog media, audio extraction for formats not supported automatically by our website, or encoding of the final media (which may be required for some media formats).
7. You may pre-purchase time on the CaptionSync server in order to take advantage of volume discounts or if you do not have credit approval with us. Pre-purchased CaptionSync time is non-refundable and expires five years after purchase if not used. The minimum transaction for pre-purchase is \$75.
8. Prices are valid through March 31, 2012.
9. All prices are in US Dollars.





Computer Prompting & Captioning Co.

1010 Rockville Pike, Suite 306  
Rockville, Maryland 20852-1419, USA  
301-738-8487 • FAX 8488 • TTY 8489  
[info@cpcweb.com](mailto:info@cpcweb.com) • [www.cpcweb.com](http://www.cpcweb.com)

DATE: 01/12/2012 **PROPOSAL FOR A CAPTIONING SERVICE**

Fed ID#: 52-1911964

To: Toiriste O'neal  
252-752-1898. Ext 206  
[Toneal@kccfamily.com](mailto:Toneal@kccfamily.com)

**Option 1:**

Qty	Items & Descriptions	Unit Price per video
52	<b>2 Day turnaround</b> – 30 minute video transcription and closed captioning. Client will send an mp4 and an mp3 file, and client will receive an .scc format file	\$255

**Option 2:**

52	<b>5 Day turnaround</b> – 30 minute video transcription and closed captioning. Client will send an mp4 and an mp3 file, and client will receive an .scc format file	\$285
----	---	-------

**Option 3:**

52	<b>10 Day turnaround</b> – 30 minute video transcription and closed captioning. Client will send an mp4 and an mp3 file, and client will receive an .scc format file	\$430
----	--	-------

This proposal is valid for 90 days.

To place your order, please fill out this online order form:

[https://www.cpcweb.com/order/service/service\\_form.html](https://www.cpcweb.com/order/service/service_form.html)

**Sole Source Declaration**

We are the manufacturer and vendor of all CPC software and hardware. We do not have a dealer network, so there are no official vendors that sell CPC software or hardware.

Prepared by Matt Olman  
(301) 738-8487  
[service@cpcweb.com](mailto:service@cpcweb.com)

*For over 25 years, CPC has been meeting the closed captioning needs of thousands of organizations, both large and small. Our captioning software and services bring you the benefits of that long experience. Most importantly, with an unequaled history of captioning software breakthroughs, your CPC software will never become obsolete.*

## Television Cost Worksheet

	Per/HR/Show	# Shows/Hours	Annual	Cost Per Show
Video Technician	\$10.0	1040	\$10,400	\$49.52
Matters of Heart Show		210	\$47,860	\$227.90
Automatic Sync	\$166.8	105.00	\$17,511	
Video Caption Corporation	\$200.0	105.00	\$21,000	
Computer Prompting and Captioning	\$255.0	105.00	\$26,775	
Average Closed Caption Rate			\$21,761.95	\$207.26